

EXHIBIT “C”

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
SOULEMA SAGNE,

Plaintiff(s),

- against -

SHIRLEY EXPRESS LLC and RICARDO J. CANTOS,
Defendant(s).
-----X

**RESPONSE TO
COMBINED DEMANDS**

Index No.: 155708/2018

S I R S:

In response to your demands dated August 15, 2018, and in accordance with the rules of discovery, plaintiff sets forth as follows:

RESPONSE TO DEMAND FOR AUTHORIZATIONS

1. Plaintiff previously provided a duly executed authorization for you to obtain copies of the plaintiff's employment records from LA Reserve, Inc. on October 29, 2018. See number eight (8) of the response.

2. Plaintiff previously provided duly executed authorizations for you to obtain copies of the entire medical records and/or reports from all health care providers who provided treatment for injuries related to the subject accident on October 29, 2018. See number two (2) of the response.

RESPONSE TO DEMAND FOR SOCIAL MEDIA INFORMATION

Plaintiff objects to your various demands for social networking information and documentation on the grounds that you failed to establish a factual predicate with respect to the relevancy of this evidence.

RESPONSE TO DEMAND FOR OPPOSING PARTY STATEMENTS

Other than the MV104's which are public records, plaintiff is not in possession of any statements made by any party that you represent in this occurrence.

RESPONSE TO DEMAND FOR EXPERT WITNESS DISCLOSURE

At the time of trial the plaintiff will call to testify those physicians whose names and/or reports have been exchanged and/or whose names appear in the reports or hospital

records. At this time, plaintiff is unaware of any other expert witness that may be called upon to testify at the trial of this action.

RESPONSE TO DEMAND FOR PHOTOGRAPHS AND/OR VIDEO

Plaintiff is not in possession of any photographs related to the subject accident.

RESPONSE TO DEMAND FOR ACCIDENT REPORTS

Other than the MV104's and the police report which are public records, plaintiff is not in possession of any reports related to this occurrence.

RESPONSE TO DEMAND FOR NAMES AND ADDRESSES OF WITNESSES

Other than natural parties to this action and those persons listed on the police report, the following were witnesses to this occurrence: None.

RESPONSE TO DEMAND FOR COLLATERAL SOURCE INFORMATION

Plaintiff previously provided a duly executed authorization for you to obtain a copy of the no-fault file related to the subject accident from State Farm Auto Claims on October 29, 2018. See number six (6) of the response.

RESPONSE TO DEMAND FOR MEDICAL INFORMATION

1-5. Plaintiff previously provided duly executed authorizations for you to obtain copies of the entire medical records and/or reports from all health care providers who provided treatment for injuries related to the subject accident on October 29, 2018. See number two (2) of the response.

6. Annexed hereto is a duly executed authorization for you to obtain copies of the pharmacy records from Lincoln Pharmacy.

RESPONSE TO DEMAND FOR PRIOR PLEADINGS

Not applicable.

RESPONSE TO DEMAND FOR CONTRACTS

Not applicable.

RESPONSE TO DEMAND FOR INSURANCE INFORMATION

a-b. Plaintiff is not in possession of any primary, contributing, and excess insurance agreement information related to the subject accident.

RESPONSE TO DEMAND FOR PROOF OF RESIDENCY FOR SOULEMA SAGNE

Plaintiff SOULEMA SAGNE presently resides at 2550 Seventh Avenue, Apartment 5A, New York, New York 10029 and so resided at the time of the occurrence.

RESPONSE TO DEMAND FOR STATEMENT OF DAMAGES

The plaintiff, Soulema Sagne, demands judgment against the defendant in the sum of FIVE MILLION (\$5,000,000.00) DOLLARS; together with interest, and the costs and disbursements of this action.

RESPONSE TO DEMAND FOR AUTHORIZATIONS FOR TAX RETURNS

Plaintiff objects to your demand for an IRS tax form 4506 allowing you to obtain copies of the plaintiff's tax returns on the grounds that the plaintiff was not self-employed at the time of the accident. Furthermore, plaintiff previously provided a duly executed authorization for you to obtain copies of the plaintiff's employment records from LA Reserve, Inc. on October 29, 2018. See number eight (8) of the response.

RESPONSE TO DEMAND FOR SCHOOL RECORDS

Not applicable. Plaintiff was not a student at the time of the accident.

RESPONSE TO DEMAND FOR EMPLOYMENT RECORDS

1-2. Plaintiff previously provided a duly executed authorization for you to obtain copies of the plaintiff's employment records from LA Reserve, Inc. on October 29, 2018. See number eight (8) of the response.

RESPONSE TO DEMAND FOR WORKERS COMPENSATION RECORDS

Not Applicable.

RESPONSE TO DEMAND FOR NO-FAULT INSURANCE AUTHORIZATIONS

Plaintiff previously provided a duly executed authorization for you to obtain a copy of the no-fault file related to the subject accident from State Farm Auto Claims on October 29, 2018. See number six (6) of the response.

RESPONSE TO DEMAND FOR SOCIAL SECURITY OR DISABILITY RECORDS

Not applicable.

RESPONSE TO DEMAND FOR INSURANCE COVERAGE

Plaintiff is not in possession of any documentation related to insurance coverage related to the subject accident.

Dated: New York, New York
January 03, 2019

Yours, etc.



ADAM S. BERNSTEIN
BUDIN, REISMAN, KUPFERBERG & BERNSTEIN, LLP
Attorneys for Plaintiff(s)
112 Madison Avenue, 2nd Floor
New York, New York 10016
(212) 696-5500
File No.: KK11004/jr

TO:
Gallo Vitucci & Klar LLP
Attorney For: The Defendants
90 Broad Street
12th Floor
New York, NY 10004
Phone: (212) 683-7100